

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CYTIVA SWEDEN AB,
and GLOBAL LIFE SCIENCES
SOLUTIONS USA LLC,

Plaintiffs,

V.

BIO-RAD LABORATORIES, INC.,

Defendant.

$$\begin{array}{c}) \\) \\) \\) \\) \\) \\) \\) \\) \\) \end{array}$$

C.A. No. 18-1899-CFC-SRF
Consolidated

DEMAND FOR JURY TRIAL

PUBLIC VERSION

**DECLARATION OF FELIPE CORREDOR IN SUPPORT OF
DEFENDANT BIO-RAD LABORATORIES, INC.'S ANSWERING BRIEF
IN OPPOSITION TO PLAINTIFFS' MOTION TO EXCLUDE EXPERT
OPINIONS OF DR. BRUCE GALE AND IN OPPOSITION TO
PLAINTIFFS' MOTION TO EXCLUDE EXPERT OPINIONS OF DR.
JAMES KEARL**

OF COUNSEL:

Kevin P.B. Johnson
Brian C. Cannon
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Tel: (650) 801-5000

David Bilsker
Felipe Corredor
Andrew E. Naravage
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
50 California Street, 22nd Floor
San Francisco, CA 94111
Tel: (415) 875-6600

David E. Moore (#3983)
Bindu A. Palapura (#5370)
Alan R. Silverstein (#5066)
POTTER ANDERSON & CORROON LLP
Hercules Plaza, 6th Floor
1313 N. Market Street
Wilmington, DE 19801
Tel: (302) 984-6000
dmoore@potteranderson.com
bpalapura@potteranderson.com
asilverstein@potteranderson.com

*Attorneys for Defendant Bio-Rad
Laboratories, Inc.*

Anne S. Toker
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010
Tel: (212) 849-7000

Sean D. Damon
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
1300 I Street NW Suite 900
Washington, D.C. 20005
Tel: (202) 538-8000

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PLAINTIFFS' MOTION TO EXCLUDE EXPERT OPINIONS OF DR.
JAMES KEARL**

I, Felipe Corredor, declare and state as follows:

1. I am an associate at the firm of Quinn Emanuel Urquhart & Sullivan, LLP and am counsel of record for Defendant Bio-Rad Laboratories, Inc. (“Bio-Rad”). I provide this declaration in support of Defendant Bio-Rad’s Answering Brief in Opposition to Plaintiffs’ Motion to Exclude Expert Opinions of Dr. Bruce Gale and in Opposition to Plaintiffs’ Motion to Exclude Expert Opinions of Dr. James Kearl.

2. Attached hereto as **Exhibit A** is a true and correct copy of the Court's claim construction order in this case, entered as D.I. 89 on May 28, 2020.

3. Attached hereto as **Exhibit B** is a true and correct copy of excerpts of the Rebuttal Expert Report of Dr. Bruce Gale in this case, served on October 21, 2020.

4. Attached hereto as **Exhibit C** is a true and correct copy of United States Patent No. 9,671,420.

5. Attached hereto as **Exhibit D** is a true and correct copy of the Patent Trial and Appeal Board's decision in the case *Bio-Rad Laboratories, Inc. v. GE Healthcare Bio-Sciences AB*, No. IPR2015-01826, entered on February 6, 2017.

6. Attached hereto as **Exhibit E** is a true and correct copy of excerpts of a hearing in the case *GE Healthcare Bio-Sciences AB v. Bio-Rad Laboratories, Inc.*, No. 14 Civ. 7080 (S.D.N.Y.), held on June 5, 2015.

7. **Exhibit F** is intentionally omitted.

8. Attached hereto as **Exhibit G** is a true and correct copy of excerpts of the transcript of the deposition of Dr. Bruce Gale, taken on November 25, 2020 in this case.

9. Attached hereto as **Exhibit H** is a true and correct copy of excerpts of the Opening Expert Report of Dr. Bruce Gale in this case, served on September 14, 2020.

10. Attached hereto as **Exhibit I** is a true and correct copy of excerpts of the transcript of the deposition of Kevin Petersen, taken on November 18, 2020 in this case.

11. Attached hereto as **Exhibit J** is a true and correct copy of the Test Report attached as Exhibit 4 to the Opening Expert Report of Dr. Bruce Gale in this case, served on September 14, 2020.

12. Attached hereto as **Exhibit K** is a true and correct copy of excerpts of the transcript of the deposition of Dr. Steven Wereley, taken on November 20, 2020 in this case.

13. Attached hereto as **Exhibit L** is a true and correct copy of an email from Sean Damon, counsel for Bio-Rad, to Michael Sebba, counsel for Plaintiffs, dated October 29, 2020.

14. Attached hereto as **Exhibit M** is a true and correct copy of the *curriculum vitae* of Dr. Bruce Gale attached as Exhibit 1 to the Opening Expert Report of Dr. Bruce Gale in this case, served on September 14, 2020.

15. Attached hereto as **Exhibit N** is a true and correct copy of excerpts of the Reply Expert Report of Dr. Bruce Gale in this case, served on November 11, 2020.

16. Attached hereto as **Exhibit O** is a true and correct copy of excerpts of the Expert Report of Professor James R. Kearl in this case, served on October 21, 2020.

17. Attached hereto as **Exhibit P** is a true and correct copy of excerpts of the transcript of the deposition of Professor James R. Kearl, taken on November 23, 2020 in this case.

18. Attached hereto as **Exhibit Q** is a true and correct copy of Exhibit F to the Expert Report of Professor James R. Kearl in this case, served on October 21, 2020.

19. Attached hereto as **Exhibit R** is a true and correct copy of excerpts of the transcript of the claim construction hearing in this case, held on May 14, 2020.

20. Attached hereto as **Exhibit S** is a true and correct copy of excerpts of the Opening Expert Report of Steven Wereley in this case, served on September 11, 2020.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 12, 2021 in San Francisco, California.

/s/ Felipe Corredor
Felipe Corredor